



February 13, 2024

The Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket No. 17-59; Call Authentication Trust Anchor, WC Docket No. 17-97

Dear Chairwoman Rosenworcel,

One of the Commission's primary objectives in recent administrations has been to find solutions that bring trust and confidence back to the telecommunications network through the reduction of fraud and spam that harms consumers and deters them from answering phone calls. The undersigned associations appreciate the Commission's efforts on the illegal robocalling front.

In support of the Commission's goals, we are writing to call your attention to the detrimental effects that the lack of an internet protocol ("IP") interconnection framework continues to have on the integrity and reliability of our national telecommunications network. Without a framework, providers are not incented to exchange voice traffic in IP, undermining the robustness and security of our telecommunications infrastructure. Several critical developments, including the implementation of STIR/SHAKEN and other forthcoming caller ID authentication initiatives, have been, and will continue to be, impeded without ubiquitous IP interconnection.

As one concerning example, the lack of IP interconnection compromises the efficacy of the STIR/SHAKEN ecosystem, in which industry has invested millions of dollars to implement. It has been observed that networks relying entirely on IP, and which sign 100% of their outbound

calls, are receiving only a fraction of inbound calls with STIR/SHAKEN information, limiting the benefits of STIR/SHAKEN to curb fraudulent activities within the ecosystem.

Moreover, the Commission’s ongoing efforts to combat illegal robocalling, particularly in relation to the expected critical role of Rich Call Data (“RCD”), necessitate a robust IP interconnection framework. RCD is perceived as a flexible and impartial approach to enhancing caller identification information, but its effectiveness requires the transmission of calls over IP networks, which is again impeded by the lack of IP interconnection arrangements that can circumvent TDM switches.

The absence of an IP interconnection framework also poses significant challenges to advancing the transition to Next Generation 911 (“NG911”). This deficiency not only obstructs many of the feature-rich emergency service advancements made possible with NG911, but continued depletion of the nation’s TDM infrastructure without an effective transition to IP will increasingly jeopardize public safety for all Americans.

In response to these pressing challenges, the industry has collectively developed various solutions to encourage and increase IP interconnection within the network.¹ We urge the Commission to proactively examine and endorse measures that promote IP interconnection,² facilitating the implementation of technologies that promise to mitigate fraudulent calls, enhance the credibility of the telecommunications network, and fortify public safety measures.

Your prompt attention to addressing this critical issue would be greatly appreciated. Together, we can work towards fortifying the telecommunications network, ensuring the security and integrity of our communications infrastructure, and fostering public trust in the evolving digital landscape.

Thank you for your consideration.

Respectfully submitted,

/s/ Christopher L. Shipley

/s/ Brian Ford

Christopher L. Shipley
Executive Director of Public Policy
INCOMPAS
1100 G Street NW, Suite 800
Washington, DC 20005
(202) 872-5746

Brian Ford
Vice President – Federal Regulatory
NTCA—The Rural Broadband Association
4121 Wilson Blvd., Suite 1000
Arlington, VA 22203
(703) 351-2000

¹ Letter of SIP Interconnection Working Group Co-Chairs to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-97 (filed Nov. 16, 2022) (“SIP Interconnection Working Group Report”).

² See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Notice of Inquiry, FCC 22-81 (rel. Oct. 28, 2022).

/s/ Joe Marion

Joe Marion
President
Cloud Communications Alliance
131 NW 1st Avenue
Delray Beach, FL 33444
(561) 232-3891

/s/ Glenn Richards

Glenn Richards
Pillsbury Winthrop Shaw Pittman LLP
Voice On the Net Coalition
1200 Seventeenth Street, NW
Washington, DC 20036
(202) 663-8000